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Via ECF

Hon. James L. Garrity, Jr.  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green, Courtroom 601  
New York, New York 10004

Re: In re Orly Genger, Ch. 7, Case No. 19-13895

Your Honor:

The OG Trust's submission today (Doc. 394) is in breach of the agreed-upon procedure for submitting deposition questions for rulings.

When Mr. Oldner's continued deposition was suspended, the parties expressly agreed that a list of the questions at issue would be generated based on the transcript and submitted to "ask the Court" for rulings at a hearing where both sides could be heard as to relevance. Oldner Tr. 536:19 to 537:10 ("we will mark the questions that we want presented to the Court and then ask the judge at a later date to rule upon or have a hearing to rule upon those questions. And if the judge orders that we get answers to the questions, then Mr. Oldner will come back at a mutually agreed upon time. Is that correct? MR. POLLOCK: That sounds fine."). That is why we limited our March 29 letter (Doc. 392) to a simple list of the submitted questions.

On behalf of debtor, we reiterate our request for a hearing so that debtor and other parties may be heard as to the relevance of the disputed questions.

Respectfully submitted,

*/s Michael Paul Bowen*

cc: All Counsel (via ECF)